

Mr. Lester Snow
CalFed Bay/Delta Program
1416 Ninth Street Suite 1155
Sacramento, CA 95814

Dear Mr Snow

I submit these comments as a citizen though I am also represented by the comments submitted by the Sierra Club and the Environmental Water Caucus. The comments on both those submissions reflect my concerns of why it was difficult for citizens to fully assess the implications of the proposed actions in the FEIS/EIR. I reflect on how much more useful and extensive the public input might have been had citizens been privy to the major amount of analysis prepared by the organizations represented on the Environmental Water Caucus.

Certainly a more broadly supported public education program is needed at all levels to better help the public understand the nature of the complex decisions that are needed. It will be helpful to complete the many information gaps which are noted in the document to be forthcoming, without which it is difficult to fully assess the project impacts. Though there has been an effort to involve the public through stakeholder groups, there needs to be more attention to the larger public to make it easier to extract the major assumptions and long term impacts. (In some cases, flawed assumptions like those based on the DWR's 160 which overestimates the demand for water and underestimates the role of conservation to address that demand).

The FEIS/EIR did not contain a fully analyzed alternative based on conservation and efficiency with more detailed regulatory options in addition to voluntary, that could prevent extensive public investments in additional storage and conveyance facilities. Such an alternative should be assessed.

I will be interested in the resolution of "CalFed agencies considering a policy that would place a tougher standard of water management on water suppliers that may want to receive water from the CalFed program" as noted in Efficiency Appendix 2-6. Was such a resolution assumed in the document numbers for efficiency? The same question applies to the "CalFed agencies are considering the policy that a water supplier must meet criteria for the measurement of water deliveries and water pricing contained in the "Criteria for Evaluating Water Management Plans issued by the US Bureau of Reclamation...." (page 2-7 of same appendix).

When will CalFed decide if "widespread demonstration of efficient use by local water suppliers and irrigation districts could be a prerequisite to CalFed implementation of other program actions for water supply reliability"? (Page 2-9 Efficiency Appendix) What will be the timetable and conditions under which CalFed will decide "if an acceptable majority of agricultural water suppliers have not prepared, adopted, received Council endorsement and begun implementation of their agricultural water management plans by January 1, 1999, then legislative and regulatory mechanisms will be triggered"? What is "acceptable"? (Efficiency Technical Appendix p-2-13). What are the assumptions in the efficiency numbers re the above actions?

Though the FEIS/EIR does not consider crop changes as efficiency improvements, there needs to be consideration given to incentives that would encourage the replacing of less water-intensive profitable crops rather than spending the same money on more concrete structures. On the urban side, what assumptions of savings could be made if local landscape ordinances were adopted in all communities in California? (p 5-16, Efficiency Appendix).

Calfed has underestimated the potential for water conservation both in the urban and agriculture sectors. Greater attention to these areas can help avoid more expensive and environmentally harmful alternatives.

I appreciate there was a 30 day extension for the public though it was also too short given the extensive size of the documentation. I also appreciate that Calfed has agreed to provide more documentation prior to coming to a final decision. I would urge that subsequent comment periods be longer and that the assumptions, and key issues be posed in more layman format that helps educate the public about the tradeoffs, information gaps, areas of risk etc. (including important information in the technical appendices that would have been more helpful if presented in the main documents)

Submitted

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